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ATTORNEYS FOR JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Case No. 19-34054
HIGHLAND CAPITAL MANAGEMENT, L.P.	§	
	§	Chapter 11
Debtor.	§	

**JAMES DONDERO’S RESPONSE IN OPPOSITION TO THE DEBTOR’S
FOURTH MOTION TO EXTEND TIME TO REMOVE ACTIONS**

*The Debtor’s Motion for Entry of an Order Further Extending the Period Within Which It May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the “Motion”)*¹ should be denied. This is the Debtor’s fourth such motion;² a plan has been confirmed; and for reasons apparently within the Debtor’s control, that plan has not gone effective. The Debtor asks for this fourth extension to be without prejudice to further extensions – which could ultimately extend a 90-day period beyond two years. Motion, at ¶ 20. This is an attempt to artificially enlarge this Court’s jurisdiction. Rule 9006 has limits. *E.g., In re Health Support Network, Inc.*, 2018 Bankr. LEXIS 973, at *7-8 (Bankr. M.D. Fla. Mar. 30, 2018).

¹ Docket No. 2304.

² See Docket Nos. 351, 747, and 1583, extending the 90-day removal period by a year and a half.

Dated: June 4, 2021

Respectfully submitted,

/s/ William R. Howell, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on June 4, 2021, this document was filed electronically via the Court's CM/ECF system, which automatically provides notice to registered parties.

/s/ William R. Howell, Jr.

William R. Howell, Jr.